IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,	§ §
Plaintiffs,	§ §
v.	§ § Inner Twick Domondod
Broadcom Inc. Brocade Communications Systems LLC Extreme Networks, Inc.	§ Jury Trial Demanded § § §
Defendants.	§

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Comes now Plaintiff SNMP Research, Inc. by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court's Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], seeks leave of this Court to submit certain documents under seal and/or in redacted form as indicated below.

Plaintiff moves for leave to file a redacted version of Exhibit C to the Declaration of Olivia Weber in Support of Plaintiff's Motion to Compel Discovery Responses from Defendant Extreme Networks, Inc. which contains Plaintiff's commercially sensitive, confidential pricing term on page 3. *See Moore v. Westgate Resorts*, Ltd., 2020 WL 7017738, at *1-3 (E.D. Tenn. May 22, 2020). It also contains information belonging to Defendant Extreme which Plaintiff has designated as Confidential in an abundance of caution.

Plaintiff also moves for leave to file a redacted version of Exhibit P to the Declaration of Olivia Weber in Support of Plaintiff's Motion to Compel Discovery Responses from Defendant Extreme Networks, Inc., Letter from Simone Yew to Katy Moty dated August 1, 2019, because Defendant Extreme has designated certain language in this letter as Confidential.

Plaintiff also moves to file a redacted version of its Memorandum of Law in support of Plaintiff's Motion to Compel Discovery Responses from Defendant Extreme, because it refers to Exhibit P, identified above, including language Defendant Extreme has designated as Confidential.

Plaintiff moves for leave to file under seal Exhibit K to the Declaration of Olivia Weber in Support of Plaintiff's Motion to Compel Discovery Responses from Defendant Extreme Networks, Inc., Defendant Extreme's Second Supplemental Responses to Plaintiff's Interrogatories dated August 28, 2021, which Defendant Extreme has designated as Confidential in their entirety.

Other than Plaintiff's request to seal Plaintiff's sole pricing term on page 3 of Exhibit C, Plaintiff does not support this Motion because the information contained in each of the foregoing items does not appear to meet the standard for sealing specified in the Court's Order. However, because Defendant Extreme marked Exhibits K and P Confidential at the time of their production to Plaintiff, and because certain information contained in Exhibit C could potentially be information Defendant Extreme considers Confidential, Plaintiff presents this Motion to the Court.

Under Local Rule 26.2 Plaintiff is publicly filing a redacted version of the following items:

- Memorandum in Support of Motion to Compel Discovery Responses from Defendant Extreme Networks, Inc.
- Exhibit C to Declaration of Olivia Weber
- Exhibit P to Declaration of Olivia Weber

As required by the Memorandum and Order Regarding Sealing Confidential Information, the unredacted versions of the documents referenced herein are provided as exhibits to this Motion with the portion of each document proposed to be redacted highlighted, except as noted below

Plaintiff is also filing, under Local Rule 26.2, a sealed version of Defendant Extreme's Second Supplemental Responses to Plaintiff's Interrogatories, because Defendant Extreme has designated the entire document Confidential.

Respectfully submitted this 4th day of October, 2021.

/s/ Cheryl G. Rice____

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